

01-19-01008-CR

In the
Court of Appeals
for the First Judicial District of Texas
at Houston

FILED IN
1st COURT OF APPEALS
HOUSTON, TEXAS
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CHRISTOPHER A. PRINE
Clerk

No. 2012280

In the County Criminal Court at Law No. 12
of Harris County, Texas

The State of Texas

Appellant

v.

Lakesia Keyon Brent

Appellee

**State's First Motion for Extension
of Time to File Appellate Brief**

To the Honorable Court of Appeals:

The State of Texas, pursuant to TEX. R. APP. P. 2 & 10.5, moves for an extension of time in which to file its appellate brief. The following facts are relevant:

1. On Feb. 27, 2015, the State filed a criminal information charging Appellee with the misdemeanor offense of theft, which occurred on or about Feb. 17, 2015. (C.R. 06). On March 03, 2016, a petit jury found Appellant guilty of the offense. (C.R. 46). On March 04, 2016, the trial court

assessed Appellee's punishment at 180 days in jail, but suspended that sentence and placed Appellee on community supervision for one year. (C.R. 48). On March 22, 2017, Appellee's community supervision naturally expired by operation of law, and the trial court discharged her. (C.R. 53). On Nov. 01, 2019 Appellee moved to set aside her conviction and dismiss the information pursuant to Art. 42A.701(f). (C.R. 55). On Nov. 19, 2019, the trial court granted Appellee's motion and dismissed the cause.

2. The State's brief was due on Feb. 20, 2020. The State requests a ten-day extension of time to March 02, 2019.
3. This is the State's first request for extension.
4. The following facts are relied upon to show good cause for an extension of time to allow the State to file its brief:
 - a. In addition to this brief, the undersigned attorney has been assigned, and is working on, the following:
 - a. Antonio Hopkins-McGee
01-19-00475-CR
 - b. Ex parte Walter Allen, Jr.
14-19-00898-CR
 - b. Additionally, on Feb. 09, 2020, the undersigned attorney had a death in his family. An immediate family member died unexpectedly. This unforeseen event, and the immediate aftermath, caused a major disruption in the working ability of the undersigned attorney.

WHEREFORE, the State prays that this Court will grant the requested extension.

Respectfully submitted,

/s/ John David Crump
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CERTIFICATE OF SERVICE

I certify that I have requested that efile.txcourts.gov electronically serve a
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Date: Feb. 21, 2020